

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Ezekial Johnson JR
 All other names by which
 you have been known: _____
 ID Number 137875
 Current Institution Maximum Security
 Address Po Box 8273
Cranston RI 02920
 City State Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name Black Live Matter Global Network Foundation INC
 Job or Title (*if known*) _____
 Shield Number 248 3rd Street Room 305
 Employer "I have 2
addresses" Oakland, CA 94612
 Address 1330 Broadway 3rd Floor
Oakland CA 94612
 City State Zip Code
☐ Individual capacity ☒ Official capacity

Defendant No. 2

Name Gary Dantzer
 Job or Title (*if known*) Executive Director
 Shield Number _____
 Employer Black Lives Matter "R.I."
 Address 225 Main Street
Punucket R.I. 02860
 City State Zip Code
☒ Individual capacity ☒ Official capacity

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Defendant No. 3

Name

Bernice Morris

Job or Title (if known)

Policy Director

Shield Number

Employer

Black Lives Matter "P.I."

Address

225 Main Street

Pawtucket
CityR.I.
State

02860

Zip Code

☒ Individual capacity☒ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Shield Number

Employer

Address

City

State

Zip Code

☐ Individual capacity☐ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia," 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (*explain*) Still fighting for my freedom.

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

"Attached"

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

"Attached"

Statement Of Claim

I'm Ezekial Johnson JR I contacted "BLM" R.I. for advocacy support in late January or early February of 2021. They deceived me into a verbal contract which if I win my civil suit I pay "BLM" 1.5 million dollars. "BLM" is a non-profit organizations with branches in every State of our country. "BLM" used and targeted my situation for their profit. Doing so is illegal; every conversation I had with "BLM" was recorded including our verbal agreement. I am locked up at Maximum Security and I plan to subpoena all of my phone calls from the RI DOC. "BLM" name and what they represent speaks volumes it's ashame that their using their platform to profit from their own kind. "BLM" planned to extort me for 1.5 million dollars; so now I'm filing a civil suit to protect myself and to prevent "BLM" from doing this again. Here is my claim.

So I contacted "BLM" for advocacy support and originally I wanted their advocacy support for my pending civil suit against my former comany Ocean Spray regarding discrimination. I had a mediation hearing coming up and I needed a support letter from "BLM". So I spoke to "Brother" Gary Dantzler "Executive Director" and Bernice Morris "Policy Director," and they decided that they would help me but only if I sign a contract. I clearly explained the details and the fact that Ocean Spray is a billion dollar company and if I win I would give "BLM" a donation. So Gary and Bernice tried to put themselves on my visting list so we could handle the details of the contract in person. Unfortunately, Gary was unable to visit me due to his criminal record but Bernice was approved. Due to Covid we were only able to visit each other virtually and

we did one time. This video visit was also recorded at the R.I. Doc. By the time Bernice and I had are first visit I already had drew out my contract and sent it to "BLM." Attached is a copy of my contract. At the visit was the first time "BLM" and myself ever discussed numbers; if I won they wanted 1.5 million dollars. I was confused at the number and at the fact that "BLM" was telling me what I have to donate for their advocacy and support. However, I am convicted for murder and currently fighting for my innocence and in the contract I drew up I ask "BLM" for advocacy and support in my criminal case as well. So ~~once~~ I made that clear to Bernice that the advocacy contract now included my civil suit and criminal case; and "BLM" had no problems with ~~two~~ ^{it}. So when "BLM" finally received my contract they were not able to agree ~~with~~ ^{to} it. So I had several conversations with "BLM" over the phone and we finally made a verbal agreement. I was never comfortable with these conversations with "BLM" and when I have these recordings subpoenaed from the R.I. DOC it will clearly depict just that. However, before ~~me~~ we made any agreement my mediation hearing was approaching so "BLM" sent a support letter to Ocean Spray, my mediator "Berry Mitchell", and to myself. Attached is the support letter. However, my Direct Appeal oral argument was approaching for my criminal case as well which was the most important date in my life at the time. "BLM" refused to be present and advocate for me at my Direct Appeal unless we had a contract. My oral arguement for my Direct Appeal was on March 3rd, 2021 so I made a verbal contract agreement with "BLM" over the phone here at

the R.I. DOC less than a week before my Direct Appeal oral argument. I agreed to pay "BLM" 1.5 million dollars for their advocacy and full support in my civil and criminal case if I in fact win my civil case. "BLM" reached out to my criminal attorney George J West and "BLM" was present at my Direct Appeal oral argument.

"BLM" is a non-profit organization. "BLM" has exploited ~~my~~ my vulnerabilities and life for profit. What "BLM" has done is illegal and plainly disgusting.

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C. What date and approximate time did the events giving rise to your claim(s) occur?

"Attached"

D. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

"Attached"

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

N/A

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

"Attached"

Relief

I want the Court to hold "BLM" Global Network Foundation INC and their employers accountable for their actions. I also want to be compensated for their actions as well as for emotional pain, suffering, inconvenience, ~~and~~ mental anguish, and etc. As of right now I am undecided on the dollar amount I want for my punitive and compensatory damages.

"BLM" has exploited my vulnerabilities for profit. "BLM" an Global non-profit organization has conducted a verbal contract with me for the amount of 1.5 million dollars for their advocacy and full support. "BLM" was made and built to provide these services for free to the Black community. What "BLM" has done is clearly illegal and plainly disgusting and I want to be compensated accordingly.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

- ☒ Yes
☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Maximum Security Facility

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

- ☐ Yes
☐ No
☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

- ☐ Yes
☐ No
☐ Do not know

If yes, which claim(s)?

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- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

2. What did you claim in your grievance?

3. What was the result, if any?

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

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- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☐ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county and State)

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

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☐ Yes☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes☐ No

If no, give the approximate date of disposition _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

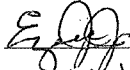
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

1/3/22

Signature of Plaintiff



Printed Name of Plaintiff

Ezekial Johnson Jr.

Prison Identification #

137875

Prison Address

PO Box 8273Cranston

City

RI

State

02920

Zip Code

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address